

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
	)	
vs.	)	No. 4:21 CR 00421 SEP-PLC
	)	
KAYVEON HUNTLEY,	)	
	)	
Defendant.	)	

**MOTION FOR PRE-TRIAL DETENTION AND HEARING**

Comes now the United States of America, by and through its attorneys, Sayler A. Fleming, United States Attorney for the Eastern District of Missouri, and Linda R. Lane, Assistant United States Attorney for said District, and moves the Court to order defendant detained pending trial, and further requests that a detention hearing be held three (3) days from the date of defendant's initial appearance before the United States Magistrate pursuant to Title 18, United States Code, Section 3141, et seq.

As and for its grounds, the Government states as follows:

1. On July 20, 2020, at 5:30 p.m. St. Louis Metropolitan Police Department responded to shooting at Athlone and Rosalie in front of Carrie's Market. A victim was shot in the stomach after being caught in the crossfire between males in a black SUV and males near the corner. Defendant was identified as the driver of the SUV. Video surveillance showed two males run toward the SUV and begin shooting. Video surveillance also shows Defendant return to the location in the black SUV, exit the vehicle, then begin picking up what were believed to be shell casings from the scene. While at the scene officers observed the SUV in the area. Officers

attempted to conduct a traffic stop of the SUV. The SUV eluded officers at a high rate of speed. The vehicle became disabled and the driver, defendant, exited the vehicle and fled on foot from officers. Defendant was located inside a basement closet of a vacant building. A search of the SUV driven by Defendant revealed a loaded 9-millimeter firearm, a box of ammunition, marijuana, capsules of fentanyl, a plastic bag containing heroin, fentanyl and tramadol, three digital scales, a coffee grinder, a bag containing multiple empty capsules, and a pill press board.

2. Defendant is charged with one count of felon in possession of a firearm, in violation of 18 U.S.C. § 922(g)(1); one count of knowingly and intentionally possess with intent to distribute one or more controlled substances; to wit: heroin and marijuana, each a Schedule I controlled substance drug, fentanyl, a Schedule II controlled substance drug, and tramadol, a Schedule IV controlled substance drug, in violation of Title 21, U.S.C. 841(b)(1)(C); and one count of possession of a firearm in furtherance of a drug trafficking crime, in violation of 18 U.S.C. 924(c)(1)(A).

3. Defendant is charged with offenses for which a maximum term of imprisonment of ten years or more is prescribed in the Controlled Substances Act (Title 21, United States Code, Section 801, et seq.), or chapter 705 of Title 46 (Maritime Drug Law Enforcement), specifically possession with intent to distribute heroin, marijuana, tramadol and fentanyl.

4. Accordingly, a rebuttable presumption arises pursuant to Title 18, United States Code, Section 3142(e)(3) that there are no conditions or combination of conditions which will reasonably assure the appearance of the defendant as required, and the safety of any other person and the community.

5. Moreover, Defendant has prior felony convictions for burglary in the second degree, theft/stealing of a firearm, possession of a firearm, and resisting felony arrest.

6. Based on the weight of the evidence against the defendant, defendant's criminal history, and the nature and seriousness of the offenses, any evidence presented by the defendant in an attempt to overcome the rebuttable presumption regarding detention will be insufficient.

WHEREFORE, there are no conditions or combination of conditions that will reasonably assure defendant's appearance as required and the safety of any other person and the community and the Government requests this Court to order defendant detained prior to trial, and further to order a detention hearing three (3) days from the date of defendant's initial appearance.

Respectfully submitted,

SAYLER A. FLEMING  
UNITED STATES ATTORNEY

/s/Linda R. Lane  
LINDA R. LANE, AT00114511A  
ASSISTANT UNITED STATES ATTORNEY  
Thomas F. Eagleton Courthouse  
111 South Tenth Street, 20th Floor  
St. Louis, Missouri 63102  
(314) 539-2200